UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW HAMPSHIRE

Conservation Law Foundation, Inc.)
Conservation Law Foundation, Inc.)
Plaintiff)
v.) Civil Action No. 1:18-cv-00996-PB
New Hampshire Fish and Game Department, et al.)
Defendants)))

CONSERVATION LAW FOUNDATION'S MOTION FOR LEAVE TO FILE REPLY TO DEFENDANTS' PARTIAL OBJECTION TO PLAINTIFF'S MOTION TO AMEND

Plaintiff, Conservation Law Foundation, Inc. ("CLF"), by and through its attorneys, and pursuant to Local Rule 7.1 (e)(2), hereby respectfully moves for leave to file a reply to Defendants' Partial Objection to Plaintiff's Motion to Amend as a Matter of Course (Doc. 15). In support of this motion, CLF states as follow:

- 1. On March 4, 2019, CLF filed a motion to amend its complaint as a matter of course. (Doc. No. 11).
- 2. On March 15, 2019, Defendants filed a partial objection to CLF's motion to amend alleging that CLF's request to include injunctive relief related to the removal of sediments from the receiving waters was not tethered to the alleged violations of the Clean Water Act set forth in CLF's 60-day notice letter (NOI). (Doc. No. 15).
- 4. The Court may benefit from citations to case law and regulations, and references to CLF's NOI, that clarify this issue. Accordingly, CLF requests leave to file the reply memorandum provided herewith as Exhibit 1.

5. Plaintiff made a good faith attempt to seek Defendants' assent to this motion but was unable to reach Defendants' counsel.

WHEREFORE, Plaintiff respectfully requests that the Court grant CLF leave to file the reply provided as Exhibit 1 and grant such other relief as it deems appropriate and just.

Respectfully Submitted,

CONSERVATION LAW FOUNDATION, INC.

Dated: March 22, 2019 By its attorneys:

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